

## Hakowski, Denise

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**From:** Hakowski, Denise  
**Sent:** Tuesday, June 03, 2014 4:07 PM  
**To:** Barron, Thomas; Kwedza, John  
**Cc:** Trulear, Brian  
**Subject:** RE: Campbelltown East WER

Whoops, I meant 55/45 effluent to sitewater ratio.

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**From:** Hakowski, Denise  
**Sent:** Tuesday, June 03, 2014 3:28 PM  
**To:** 'Barron, Thomas'; Kwedza, John  
**Cc:** Trulear, Brian  
**Subject:** RE: Campbelltown East WER

Hi Tom and John (or is it Pascal?),

Finally got around to this WER. They followed our guidance, so we are good there, but I do have one comment, but I leave it to you all to decide what course of action you care to take.

They note that although the site water samples were taken during non-rainfall, steady-state low flow conditions, but then goes on to note that the summer of 2013's rainfall prevented a true low flow condition. Based on their estimated/measured flow, flow was almost 5X low flow. EPA's streamlined WER guidance on page 3 & 4 under "Stream conditions during sampling events should be as follows:" talks about the importance of not have confounding influences of nonpoint inputs that would not be present under low flow conditions.

So, were there nonpoint inputs that would not have been present under low flow conditions or not, i.e., was the upstream water "greatly dissimilar to the quality expected during low flow conditions"? If the answer is no, or kinda no, I think the WER is good and you can move on. If the answer is yes, or maybe, you all could decide that the 55/45 sitewater to effluent ratio is enough to address that concern, or they could apply the calculated dissolved WER.

Let me know when you decide and why so my file will be complete. If you want to discuss or have any other questions/issues, let me know.

Thanks for your patience.

Denise

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**From:** Barron, Thomas [<mailto:tbarron@pa.gov>]  
**Sent:** Thursday, March 27, 2014 9:08 AM  
**To:** Kwedza, John  
**Cc:** Hakowski, Denise  
**Subject:** RE: Campbelltown East WER

Hi Pascal,

Yes, please forward a copy of this report, and the study plan to EPA Reg 3, Denise Hakowski, in Philadelphia. Denise is our WQS coordinator that will have ultimate review of any site-specific criterion we would need to incorporate into our revised WQS, if it comes to that. I will then coordinate with Denise on this review. If it does become a site-specific criterion for copper, we have specific permitting and notification requirements, as outlined in Section 93.8d. We can coordinate that once we figure out if this is

an acceptable WER and TRE; have they demonstrated the appropriate protection for all water uses, and demonstrated the relaxed copper limit is appropriate.

Thanks!  
Tom

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**From:** Kwedza, John  
**Sent:** Thursday, March 27, 2014 8:27 AM  
**To:** Barron, Thomas  
**Subject:** RE: Campbelltown East WER

Tom,

No, we did not share the report with EPA, should I send it to them? They know about the study being conducted during review of the draft permit. At this point they are expecting a relaxed copper limit or no limit on copper

Thanks,

Pascal

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**From:** Barron, Thomas  
**Sent:** Wednesday, March 26, 2014 2:39 PM  
**To:** Kwedza, John  
**Subject:** RE: Campbelltown East WER

Pascal,

I am still reviewing the TRE & WER Study Report submitted for South Londonderry Twp MA – Campbelltown East. Everything looks fine, so far; nothing out of the ordinary or unusual. A final total copper WER of 3.8 seems reasonable at this current review. I don't recall, was this report shared with EPA Reg 3 WQS or NPDES staff for their review?

The question we have, if we approve this WER, as presented, is what do they need, of the calculated WER and resulting site-specific criterion for copper, for their adjusted WQBEL for copper?

Thanks!  
Tom

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**From:** Kwedza, John  
**Sent:** Wednesday, March 26, 2014 10:56 AM  
**To:** Barron, Thomas  
**Subject:** Campbelltown East WER

Tom,

I sent the WER study plan as well as the phase 1 of the subject to you some time ago. Were you able to have it reviewed? They enquired about an update on the status of the review. Also I receive a TRE study plan submitted by Tyrone Borough, which will be forwarded to you soon. Thanks.

Pascal

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